

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-365-E**

IN RE: Exploration of a South Carolina)
Competitive Procurement Program)
for the Competitive Procurement of)
Energy and Capacity from Solar and)
Other Renewable Energy Facilities)
by an Electrical Utility as Allowed)
by South Carolina Code)
Section 58-41-20(E)(2))
(See Directive Issued on)
November 25, 2019))

**PETITION
TO
INTERVENE**

This Commission established Commission Docket 2019-365-E, on November 26, 2019, by way of Commission Directive issued on November 25, 2019, in Docket 2018-202-E, wherein this Commission found that a South Carolina competitive procurement system should be considered for South Carolina and authorized its staff to establish this Docket for an exploration of a South Carolina Competitive Procurement Program, as allowed by S.C. Code §58-41-20(E)(2).

Petitioner herein is Southern Current LLC, (“Southern Current” or “Petitioner”). This Petition to Intervene is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

1. Southern Current is a Delaware Limited Liability Corporation, duly organized and authorized to conduct business in the State of South Carolina with its principal place of business 1519 King Street Extension, Charleston, South Carolina 29405.

2. Southern Current is a solar and energy storage developer and integrator. Southern Current’s services include planning, consulting, design, system installation and maintenance and project development.

3. As a large-scale project developer, Southern Current has originated nearly 100 projects equaling 670 MW with another 350 MW of late stage projects with operational capability within the next two years. Southern Current controls a pipeline of approximately 3,000 MW of early to mid-stage utility scale projects. Southern Current's projects range in size from 1 to 100+ MW with a footprint across multiple regions of the U.S.

4. Therefore, Southern Current will be financially impacted by the important decisions to be made by this Commission in this Docket, consistent S.C. Code §58-41-20(E)(2).

5. This Commission's compliance with S.C. Code §58-41-20(E)(2) will directly impact the operations of the Southern Current. Because Southern Current's substantial business interests are located throughout the State of South Carolina, Southern Current's business interests will be materially affected.

6. Petitioner's position is that Southern Current has a direct and substantial interest in this Docket and Petitioner's interests cannot be adequately addressed by any other party. Therefore, the decision of this Commission is important to the Petitioner from a financial and business standpoint. Petitioner's Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important decision to be made in this Docket.

7. Petitioner should be allowed to intervene in this Docket, with full rights of cross-examination, discovery and participation in any Hearing to be scheduled in this Docket.

8. The granting Southern Current's Petition to Intervene is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

9. This Petition to Intervene is timely filed with this Commission.

10. Petitioner has previously received approval for intervention from this Commission, including Commission Docket 2015-8-E, Docket 2016-9-E, Docket 2016-2-E, Docket 2016-1-E, Docket 2016-3-E, Docket 2016-8-E, Docket 2017-1-E, Docket 2017-2-E, Docket 2017-3-E, Docket 2017-305-E, Docket 2017-332-E, Docket 2018-1-E and Docket 2018-2-E.

11. Southern Current is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as this Commission may deem just and proper.

Respectfully Submitted,

/s/Richard L. Whitt

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Counsel for Petitioner, Southern Current LLC.

March 16, 2020